

# Morgan Lewis

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February 10, 2016

**VIA ELECTRONIC SUBMISSION AND FIRST CLASS MAIL**

Regional Freedom of Information Officer  
U.S. EPA, Region 2  
290 Broadway, 26th Floor  
New York, NY 10007-1866

Re: Freedom of Information Act Request, EPA Region 2, Site ID: San German Ground Water Contamination Superfund Site, San German, Puerto Rico, PRN000205957

Dear Sir/Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. §§ 552 et seq., and regulations thereunder, I hereby request copies of the following:

- Copies of all responses received by the U.S. Environmental Protection Agency ("EPA") in response to all requests for information pursuant to 42 U.S.C. § 9604(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("104(e) requests") issued in connection with the San German Groundwater Contamination Site located in San German Puerto Rico (the "Site") (Site ID# PRN000205957), including, but not limited to, the responses to the following 104(e) requests in connection with the Site:
  - September 16, 2015 104(e) Request from EPA, Region II, to CLL Label Inc. (addressed to Mark McClendon, Vice President/General Counsel);
  - September 16, 2015 104(e) Request from EPA, Region II, to Cenveo, Inc. (addressed to Timothy Davis, Senior Vice President/General Counsel);
  - September 16, 2015 104(e) Request from EPA, Region II, to Hewlett-Packard Company (addressed to John Schultz, Executive Vice President/General Counsel);
  - September 16, 2015 104(e) Request from EPA, Region II, to Katy Industries, Inc. (addressed to Brian G. Nichols, Vice President of Human Resources, Legal Affairs & Risk Management);
  - September 16, 2015 104(e) Request from EPA, Region II, to Menasha Corporation (Attn: Mark P. Fogarty, Vice President, General Counsel and Corporate Secretary);

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A Pennsylvania Limited Liability Partnership | Randall B. Sunberg, Partner-in-Charge

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- September 16, 2015 104(e) Request from EPA, Region II, to Syratech Corporation (addressed to Walter Jones, President, c/o J.H. Cohn LLP); and
- Any and all other responses to 104(e) requests related to the Site which EPA has received.

Full Site Name and Location:

San German Groundwater Contamination Superfund Site  
OU-1 Source Control  
San German, Puerto Rico  
PRN000205957.

This firm agrees to pay any reasonable fees and costs incurred for locating documents for review, in addition to any subsequent costs for duplication. Before copying the requested documents, however, kindly provide me with an estimate as to the volume of the documents to be copied and the associated cost. Finally, to the extent possible, we request that documents be produced on a rolling basis, particularly with respect to the responsive documents to the specifically identified 104(e) requests listed above.

If you have any questions regarding this request, please do not hesitate to contact me at (609) 919-6676.

Sincerely,



Drew Cleary Jordan